1	Michael P. Kenny (mike.kenny@alston.com) Debra D. Bernstein (debra.bernstein@alston.com)		
2	Rodney J. Ganske (rod.ganske@alston.com)		
3	ALSTON & BIRD LLP		
4	1201 West Peachtree Street		
	Telephone: (404) 881-7000		
5	Facsimile: (404) 881-7777		
6	Douglas R. Young (dyoung@fbm.com)		
7	FARELLA BRAUN + MARTEL LLP 235 Montgomery Street		
8	San Francisco, California 94104 Telephone: (415) 954-4410		
9	Facsimile: (415) 954-4480		
	Attorneys for Plaintiffs Dell Inc. and Dell Produc	cts L.P.	
10	[additional counsel and parties listed in signature b	plock]	
11	I MITTED STATES	DISTRICT COURT	
12			
13	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
14	(SAN FRANCIS	SCO DIVISION)	
15			
		1	
16 17	IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	MASTER CASE NO. 3:07-md-1827 SI, MQ MDL NO. 1827	
18	This Document Relates To Individual Case No. 3:10-cv-01064 SI		
19			
20	DELL INC. and DELL PRODUCTS L.P.,	Individual Case No. 3:10-cv-01064 SI	
21	Plaintiffs,	STIPULATION AND [PROPOSED]	
22	V.	ORDER REGARDING EXTENSION OF TIME TO MOVE TO COMPEL ON CERTAIN DISCOVERY REQUESTS	
23	SHARP CORPORATION, et. al.		
24	Defendants.		
25	Defendants.		
26			
	Plaintiffs Dell Inc. and Dell Products I. P. ((collectively, "Dell") and Defendants Sharp	
27		. ,	
28	Corporation and Sharp Electronics Corporation (co	onectively, "Sharp") stipulate as follows:	
	1		

Case3:07-md-01827-SI Document4795 Filed02/09/12 Page2 of 6

1	WHEREAS on October 19, 2011, Dell served on Sharp its First Set of Interrogatories, First
2	Set of Requests for Admission, and First Set of Requests for Production of Documents (the
3	"Discovery");
4	WHEREAS Sharp provided Responses and Objections to the Discovery on January 9, 2012;
5	WHEREAS the parties are meeting and conferring in good faith regarding Sharp's Responses
6	and Objections to the Discovery, and to accommodate those efforts, agree to allow additional time to
7	complete the meet and confer process and extend the motion to compel deadline;
8	WHEREAS the discovery cut-off in the above-captioned case was December 8, 2011;
9	WHEREAS the current deadline for Dell to file motions to compel against Sharp related to
10	the Discovery is February 8, 2012;
11	THEREFORE, Dell and Sharp, by their respective undersigned counsel, stipulate and agree as
12	follows:
13	1. The deadline for Dell to move to compel further response to the Discovery shall be
14	extended to February 22, 2012.
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	2

Case3:07-md-01827-SI Document4795 Filed02/09/12 Page3 of 6

1	DATED: February 8, 2012	Respectfully submitted,
2		Dv. /c/ Dodnov I. Goneko
3		By: /s/ Rodney J. Ganske Michael P. Kenny, Esq.
4		Debra D. Bernstein, Esq.
		Rodney J. Ganske, Esq. ALSTON + BIRD LLP
5		1201 West Peachtree Street
6		Atlanta, Georgia 30309-3424 Tel: (404) 881-7000
7		Facsimile: (404) 881-7777
8		mike.kenny@alston.com debra.bernstein@alston.com
9		rod.ganske@alston.com
10		Douglas R. Young (dyoung@fbm.com)
11		FARELLA BRAUN + MARTEL LLP
		235 Montgomery Street San Francisco, California 94104
12		Telephone: (415) 954-4410
13		Facsimile: (415) 954-4480
14		Attorneys for Plaintiffs Dell Inc. and Dell Products
15		L.P.
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		2
		3

Case3:07-md-01827-SI Document4795 Filed02/09/12 Page4 of 6

1	DATED: February 8, 2012	Respectfully submitted,
2		D //I D D 111
3		By: /s/ Jon R. Roellke Jon R. Roellke (pro hac vice)
4		BINGHAM MCCUTCHEN LLP 2020 K Street NW
5		Washington, DC 20006-1806 (202) 373-6000 (telephone)
6		jon.roellke@bingham.com
7		Colin C. West (SBN 184095) BINGHAM MCCUTCHEN LLP
8		Three Embarcadero Center San Francisco, CA 94111-4067
9		(415) 393-2000 (telephone) (415) 393-2286 (facsimile)
10		colin.west@bingham.com
11		Kenneth A. Gallo (pro hac vice) Joseph S. Simons (pro hac vice)
12		Craig A. Benson (pro hac vice) Bruce A. Searby (pro hac vice)
13		PAUL WEISS RIFKIND WHARTON & GARRISON LLP
14		2001 K Street NW Washington, DC 20006-1806
15		(202) 223-7300 (telephone) kgallo@paulweiss.com
16		
17		Richard S. Taffet (pro hac vice) Kenneth I. Schacter (pro hac vice)
18		BINGHAM MCCUTCHEN LLP 399 Park Avenue
19		New York, NY 10022-4689 (212) 705-7000 (telephone)
		Attorneys for Defendants Sharp Corporation and
20		Sharp Electronics Corp.
21		
22		
23		
24		
25		
26		
27		
28		4

Case3:07-md-01827-SI Document4795 Filed02/09/12 Page5 of 6

1	Attestation: The filer of this document attests that the concurrence of the other signatories thereto
2	has been obtained.
3 4	By: /s/ Rodney J. Ganske Rodney J. Ganske
5	ALSTON + BIRD LLP 1201 West Peachtree Street
6	Atlanta, Georgia 30309-3424
7	Tel: (404) 881-7000 Facsimile: (404) 881-7777
8	rod.ganske@alston.com
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	5

Case3:07-md-01827-SI Document4795 Filed02/09/12 Page6 of 6

1	[PROPOSED] ORDER	
2	2 Under the parties' stipulat	lation set forth above, IT IS SO ORDERED.
3		By Sugar States
4	4 Dated:, 2012	By: Hon. Susan Illston
5	5	United States District Judge
6	6	
7	7	
8	8	
9	9	
10	0	
11	1	
12	2	
13	3	
14	4	
15	5	
16	6	
17	7	
18	8	
19		
20		
21		
22		
23		
24		
25		
26		
27		
28	8	6